



Terry D. Boss
Senior Vice President, Environment & Safety Operations

December 31, 2003
Dockets Facility
U.S. Department of Transportation
Room PL -401
400 Seventh Street, SW
Washington, D.C. 20590-0001

RE: (Docket Number RSPA-97-3001) Pipeline Safety: Periodic Underwater Inspections

INGAA is a trade association that represents interstate natural gas transmission pipeline companies. INGAA 's members in the United States are interstate pipeline companies that are regulated by the Office of Pipeline Safety ("OPS"). INGAA members represent over 60% (180,000 miles) of the total natural gas transmission piping in the U. S. and are significantly affected by this NPRM.

An extraordinary effort is going into the development, review and implementation of the Pipeline Integrity Management Rule that was just published in late December. This in combination with the timing of the holidays has made it difficult to respond in a meaningful way to the above notices rulemaking.

INGAA requests that an additional 15 days be allotted for comments to this docket.

Thank you for your consideration

Terry Boss
Senior Vice President, Environment & Safety Operations